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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

A. FROST; ANDREW AMIRNOVIN; and JOSE
RA,

Plaintiffs, and on behalf of all
others similarly-situated,

v.

LG CORPORATION; LG ELECTRONICS INC.;
LG ELECTRONICS U.S.A., INC.; LG DISPLAY
CO., LTD.; LG DISPLAY AMERICA INC.;
SAMSUNG ELECTRONICS CO., LTD.;
SAMSUNG ELECTRONICS AMERICA, INC.;
SAMSUNG SEMICONDUCTOR, INC.,
Defendants.

Master Docket No. 5:16-cv-05206-BLF

JOINT ~~PROPOSED~~ SCHEDULE



Master Docket No. 5:16-cv-05206-BLF

1 In accordance with this Court's April 20, 2017 Order, plaintiffs A. Frost, Andrew Amirnovin,
2 and Jose Ra (collectively, "Plaintiffs"), and defendants LG Electronics, Inc. ("LGE"), LG Electronics
3 U.S.A., Inc., LG Display Co., Ltd. ("LGD"), LG Display America, Inc., ("LG Defendants"), Samsung
4 Electronics Co. Ltd., Samsung Electronics America, Inc., and Samsung Semiconductor, Inc. (the
5 "Samsung Defendants," and collectively, "Defendants"), hereby provide this Joint Proposed Schedule
6 for completing jurisdictional discovery and amending the pleadings. *See* Dkt. Nos. 125 & 126.

7 Plaintiffs and LGE and LGD have met and conferred and largely agree to the scope and subject
8 matter of Plaintiffs' requested jurisdictional discovery. The remaining open issues relate to Plaintiffs'
9 Request for Production 10, which seeks communications regarding the Korean parents' role in the
10 hiring, recruiting or retention of employees of LG's United States subsidiaries. Plaintiffs and LGE and
11 LGD have agreed to begin rolling production of documents while they continue to negotiate regarding
12 Request No. 10. The LG Defendants will also produce organizational charts to Plaintiffs within twelve
13 days of the date of this filing. After reviewing the charts, the Parties will meet and confer regarding
14 Request No. 10.

15 Plaintiffs and LGE and LGD are also negotiating the proper relevant time period for the LG
16 Defendants' document production. Plaintiffs request that LGE and LGD produce responsive
17 electronically stored information from 2010 to the present, and any responsive hard copies of
18 documents from 2005 to the present. LGE and LGD believe that the relevant time period for all
19 documents and information should be from 2010 to the present. Plaintiffs and LGE and LGD agree to
20 limit the relevant period for Plaintiffs' Interrogatories to 2010 to the present.

21 LGE and LGD have agreed to produce all discovery other than that subject to outstanding
22 negotiations by July 26, 2017, and to complete discovery within two months after the date that the
23 Parties either resolve negotiations with an agreement or the Court resolves any outstanding issues. If
24 necessary, the Parties will adjust the proposed schedule below to accommodate the production of
25 documents subject to outstanding negotiations. The Parties will contact the Court if they reach an
26 impasse, but do not request a telephonic case management conference at this time.

The Parties propose the following schedule:

Event	Date
Deadline to produce in response to agreed-upon discovery	July 26, 2017
Deadline to comply with discovery	Two months from date the Parties or the Court resolve remaining discovery issues
Last day to file Amended Complaint	September 4, 2017
Response(s) to Amended Complaint due	October 16, 2017
Opposition due if Response(s) are Motion(s) to Dismiss	November 27, 2017
Reply(ies) in Support of Motion(s) to Dismiss due	December 18, 2017

Dated: May 26, 2017

Respectfully Submitted,

By: /s/ Joseph R. Saveri

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Dated: May 26, 2017

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1 Dated: May 26, 2017

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20 **ATTESTATION**

21 I, Joseph R. Saveri, am the ECF User whose identification and password are being used to file
22 this Joint Proposed Schedule. I attest under penalty of perjury that concurrence in this filing has been
23 obtained from all counsel.

24 By: /s/ Joseph R. Saveri

25 Joseph R. Saveri